

**DOCUMENT CONTROL SYSTEM - CORRESPONDENCE FILE**

**WELDON SPRING SITE REMEDIAL ACTION PROJECT**  
**MX-FERGUSON CO., INC. WO 3589 (314) 441-8086**  
 7295 Highway 94 South  
 St. Charles, MO 63303

Document Number: \_\_\_\_\_

Document Type: LB-NLU-M.DNR

SUBJECT Waiver To State Regulation Originators DCN: 10 CSR 25.2-262(2)(C)  
1 DOT Requirements During Storage of Hazardous Waste

AUTHOR Don Gessen, J TO Bedan, J DATE 8/13/92

SUBJECT CODE/WORK PACKAGE NUMBER 05130

REFERENCED DOCUMENT(S) 20065

THIS IS A RESPONSE TO COMMUNICATION: NUMBER \_\_\_\_\_ DATED \_\_\_\_\_

**INITIATE ACTION ITEM ACTION ITEM TRACKING**

INDIVIDUAL ASSIGNED TO ACTION \_\_\_\_\_ DEPARTMENT \_\_\_\_\_

ACTION REQUIRED \_\_\_\_\_

DUE DATE 11 ACTION ITEM LOG NUMBER \_\_\_\_\_

IF ADDITIONAL ACTION ITEMS ARE ATTACHED, HOW MANY? \_\_\_\_\_

CLOSE ACTION ITEM

IS THIS A RESPONSE TO AN ACTION ITEM? NO 1 YES \_\_\_\_\_

ACTION ITEM LOG NUMBER \_\_\_\_\_ CLOSING DOCUMENT DIN \_\_\_\_\_

COMPLETION DATE \_\_\_\_\_ APPROVAL \_\_\_\_\_

COMMENTS \_\_\_\_\_

DISTRIBUTION	ATTACH W W/O	APPRVL.ROUTE ORDER INITIAL	DISTRIBUTION	ATTACH W W/O	APPRVL.ROUTE ORDER INITIAL	DISTRIBUTION	W W/O
J.R. Powers			M.R. Lewis			DOE	
R.R. Tucker			J.E. Williams			S.H. McCracken	
D.E. Steffen						J.B. Vanfossen	
M.R. Antram						G.A. Newtown	
C.R. Bowers						W.K. Love	
J.A. Cooney						J.E. Enright	
R.B. Ferguson						K.D. Lowrey	
B.V. Green						A. Gibson	
K.M. Greenwell			Reading File			E.R. Valdez	
P.D. Cato			Admin. Record/ENV COMP			J.M. Richmond	
E.D. Jordine			Tech Editor			M.B. Bellow	
J.B. McKee						B. Richardson	
M.B. Nelson							
J.B. Norton							
			ORIGINATOR:			DOCUMENT CONTROL	<input checked="" type="checkbox"/>

AUG 15 1992

Dr. David E. Bedan  
Division of Environmental Quality  
Missouri Department of Natural Resources  
P.O. Box 176  
Jefferson City, Missouri 65102

Dear Mr. Bedan:

**WAIVER TO STATE REGULATION 10 CSR 25.5.262 (2)(C)1 DOT  
REQUIREMENTS DURING STORAGE OF HAZARDOUS WASTE**

One of the issues discussed during the coordination meeting among DOE, EPA, and MDNR representatives held on June 10, 1992, at Weldon Spring site was compliance with the State regulation 10 CSR 25.5.262 (2)(c)1, which requires that hazardous waste stored prior to off-site shipment be in compliance with the packaging, marking, and labelling requirements of the DOT during the entire on-site storage period. As stated in the discussion, our basis for the waiver request is that the site inventory of hazardous waste is not scheduled for off-site shipment and is expected to remain in storage for several years due to the lack of mixed waste TSD facilities. To meet the requirement would not only be costly, but moreover, the requirement to repackage the waste creates a situation that could result in personnel exposure to hazardous materials.

Enclosed per your request we have compiled a cost estimate and schedule for the activities required to achieve compliance with the requirement. Please note that our original estimate of 400 containers has been revised and the current estimate is 500 containers.

Sincerely,  
"ORIGINAL SIGNED BY  
JERRY VAN FOSSEN"

Jerry S. Van Fossen  
Deputy Project Manager  
Weldon Spring Site  
Remedial Action Project

Enclosure:  
As stated

CONCURRENCES

RTG SYMBOL

INITIALS/SG.

DATE

RTG SYMBOL

INITIALS/SG.

DATE

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## COST ESTIMATE FOR HAZARDOUS MATERIAL CONTAINER TRANSFER

The following is a cost estimate and schedule for compliance with 49 CFR 171.14. Part one represents the total task estimate and part two represents estimated cost compliance per deadline.

## PART ONE

**Estimated number of containers**

500

### New Container Cost

CONTAINER COST	
- 5 gal	
-10 gal	\$ 170
-15 gal	\$ 172
-30 gal	\$ 581
-55 gal open top	\$ 160
-55 gal bung top	\$ 16,640
-85 gal poly overpack	\$ 14,210
-B-12 box	\$ 1,488
-B-25 box	\$ 4,200
TOTAL	<u>\$ 5,400</u>
	\$ 43,021

### New Label Cost

-Hazardous Waste labels	\$	250
-Hazard Class labels	\$	200
-Radioactive labels	\$	175
-Arrow up labels	\$	75
-Paint	\$	70
-Extras	\$	100
-First time relabel of 100 containers	\$	174
<b>TOTAL</b>	<b>\$</b>	<b>1,044</b>

## Material Transfer

-Transfer tools est.	
-Labor (4p X 1250hr X \$20hr)	\$ 2,000
<b>TOTAL</b>	<u>\$100,000</u>
	<b>\$102,000</b>

### Personal Protective Equipment

-Tyvek (1248 pairs x \$3ea)	\$ 3,744
-Boot covers (1248 pairs X \$2ea)	\$ 2,496
-Nitrile gloves (1248 pairs X \$4.50ea)	\$ 5,616
-Respirator cartridges (1248 pairs X \$5.83ea)	\$ 7,276
<b>TOTAL</b>	<b>\$ 19,132</b>

### Relabel Cost

-Obliterate old labels	
-Update and apply new labels	\$ 5,000
-First time relabel of 100 containers	\$ 5,000
<b>TOTAL</b>	<u>\$ 2,000</u>
	<b>\$ 12,000</b>

[illegible]

Old Container Disposal  
 -Decontamination labor (2p X 250hr X \$20hr) \$ 10,000  
 -Transportation to decon to Building 434 \$ 2,000  
 -Container compaction (2p X 125hr X \$20hr) \$ 5,000  
 -Transport to MSA \$ 3,000  
 TOTAL \$ 20,000

Misc. cost  
 TASK TOTAL \$ 5,000  
 \$202,197

PART TWO

The following 1993 and 1994 deadlines represent 100 of the 500 containers which were not filled prior to 1 October, 1991 and are not exempt per 49 CFR 171.14.

Communications on 100 containers required by October 1, 1993

New Labels  
 Relabel cost \$ 174  
 Misc. cost \$ 2,000  
 TOTAL \$ 250  
 \$ 2,424

CONCURRENCES  
 RTG SYMBOL  
 EW-94  
 INITIALS/SIG.  
 J. V. Enright  
 DATE  
 8/5/92  
 RTG SYMBOL

EW-94  
 INITIALS/SIG.  
 J. V. Enright  
 DATE  
 8/7/92  
 RTG SYMBOL

EW-94  
 INITIALS/SIG.  
 S. McCracken  
 DATE  
 8/ /92  
 RTG SYMBOL

EW-94  
 INITIALS/SIG.  
 S. McCracken  
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New packaging on 100 containers required by October 1, 1994

New containers  
 Material transfer cost \$ 11,487  
 Personal protective equipment \$ 20,400  
 New labels \$ 3,826  
 Relabel cost \$ 174  
 Old container disposal cost \$ 2,000  
 Misc. cost \$ 4,200  
 TOTAL \$ 750  
 \$ 42,837

The following 2001 deadline represents the remaining 400 containers.

Full compliance by October 1, 2001

New containers  
 Material transfer cost \$ 31,534  
 Personal protective equipment \$ 81,600  
 New labels \$ 15,306  
 Relabel cost \$ 696  
 Old container disposal cost \$ 8,000  
 Misc. cost \$ 16,800  
 TOTAL \$ 4,000  
 \$157,936

EW-94:JEnright:7006:emh:8/5/92 (MIDOTRQHTS)